

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF HAWAII  
3  
4 KERRY SHANNON, )  
5 Plaintiff, )  
6 vs. ) CIVIL NO. CV04-00086  
7 CITY AND COUNTY OF HONOLULU; )  
8 HONOLULU LIQUOR COMMISSION; )  
9 JOHN SPIERLING; in his ) DEPOSITION OF  
10 official capacity as chairman)  
11 of the Honolulu Liquor ) ROBERT SHANNON  
12 Commission; WALLACE W. )  
13 WEATHERWAX, individually and ) SEATTLE, WASHINGTON  
14 in his capacity as an agent )  
15 and employee of the Honolulu) MAY 22, 2006  
16 Liquor Commission; JOHN )  
17 CARROLL, individually and in )  
18 his capacity as an employee )  
19 of the Honolulu Liquor )  
20 Commission; ANNA HIRAI, )  
21 individually and in her )  
22 capacity as an employee of )  
23 the Honolulu Liquor )  
24 Commission; ALLAN GAYLORD, )  
25 individually and in his )  
capacity as an employee of )  
the Honolulu Liquor )  
Commission; JOHN DOES 1-10, )  
JANE DOES 1-10; DOE )  
CORPORATIONS 1-10; DOE )  
PARTNERSHIPS 1-10; DOE )  
GOVERNMENTAL AGENCIES 1-10, )  
Defendants. )  
- - - - -

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FILE NO.: A0041D7

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**EXHIBIT "D"**

1 of January.

2 Q. And did your father tell you anything about  
3 what was happening at work at that time?

4 A. Yeah.

5 Q. What did he tell you?

6 A. Just that he was getting harassed at work by  
7 his bosses, and he -- he was thinking about moving to  
8 Washington. He just wanted to get out of there. He felt his  
9 life was getting threatened.

10 Q. Had he told you -- well, strike that.

11 Had he told you about any of this before you  
12 returned home for the Christmas break?

13 A. Yes.

14 Q. Okay. When is the first time he told you about  
15 any of this?

16 MR. POTTS: About any sort of harassment at work?

17 MR. YAMAMOTO: Yes.

18 A. Well, it was -- it was before I even left for  
19 college. I was still a senior at Saint Louis, so -- but I  
20 don't remember the exact times or anything. It was when this  
21 whole trial thing started, you know, with the liquor  
22 commission guys getting caught. That's when -- I think that's  
23 when it all started. I don't remember exactly.

24 Q. Do you remember if it was the end of 2001 or  
25 beginning of 2002, because that was your senior year, right?

1 A. Yeah. I believe it was the beginning of 2002,  
2 because our Mustang got stolen, I think it was either in  
3 January of 2002 or December of 2001.

4 Q. Can you tell me the make of that -- I'm sorry.  
5 Can you tell me the year of that Mustang?

6 A. '88.

7 Q. And what type of Mustang was it?

8 A. It was a Mustang LX 5.0.

9 Q. Where was it stolen from?

10 A. From my dad's work on - what was it - Kapiolani  
11 or whatever, one of those side streets wherever he parked.

12 Q. Do you know if your father parked in the  
13 building parking lot or if he parked on the street?

14 A. I think he parked on the street.

15 Q. Did --

16 A. I --

17 Q. Oh, go ahead.

18 A. I think they all parked on the street.

19 Q. Do you know which street he parked on?

20 A. I don't remember the street names.

21 Q. And did they ever find out who stole it?

22 A. Not that I know of.

23 Q. Was the car recovered?

24 A. Yes, it was.

25 Q. And where was it recovered at?

1 REPORTER'S CERTIFICATE  
2  
3

4 I, TYAN L. LUCAS, CCR No. 1971, Certified Shorthand  
5 Reporter, certify;

6 That the foregoing proceedings were taken before me  
7 at the time and place therein set forth, at which time the  
8 witness was put under oath by me;

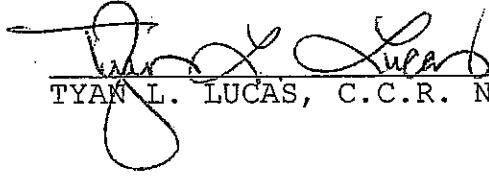
9 That the testimony of the witness, the questions  
10 propounded, and all objections and statements made at the time  
11 of the examination were recorded stenographically by me and  
12 were thereafter transcribed;

13 That the foregoing is a true and correct transcript  
14 of my shorthand notes so taken.

15 I further certify that I am not a relative or  
16 employee of any attorney of the parties, nor financially  
17 interested in the action.

18 I declare under penalty of perjury under the laws of  
19 Washington that the foregoing is true and correct.

20 Dated this 1st day of June, 2006.

21  
22  
23   
TYAN L. LUCAS, C.C.R. No. 1971  
24  
25

1 REPORTER'S CERTIFICATION OF CERTIFIED COPY

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4 I, TYAN L. LUCAS, CCR No. 1971, a Certified

5 Shorthand Reporter in the State of Washington, certify that

6 the foregoing pages 1 through 64, constitute a true and

7 correct copy of the original deposition of ROBERT SHANNON

8 taken on May 22, 2006.

9 I declare under penalty of perjury under the laws of

10 the State of Washington that the foregoing is true and

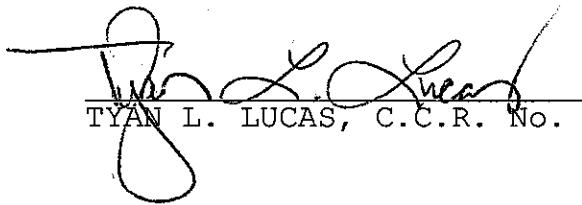
11 correct.

12

13 Dated this 1st day of June, 2006.

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TYAN L. LUCAS, C.C.R. No. 1971

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